

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

THE TRUSTEES OF PURDUE
UNIVERSITY,

Plaintiff,

VS.

STMICROELECTRONICS
INTERNATIONAL N.V., and
STMICROELECTRONICS, INC.,

Defendants

Civil Action No. 6:21-CV-00727-ADA-JTG

JURY TRIAL DEMAND

**JOINT UNOPPOSED MOTION TO EXCEED CUMULATIVE PAGE LIMITS BY
THREE PAGES**

Defendants STMicroelectronics International N.V. and STMicroelectronics Inc. (“ST”)’s understanding of Judge Albright’s page limit rules for summary judgment and *Daubert*/strike motions in the OGP is that a party’s cumulative pages for responding to summary judgment motions is limited to the cumulative pages actually used by the opposing party in the motions. Standing Order Governing Patent Cases at 9. Plaintiff The Trustees of Purdue University (“Trustees”) filed two summary judgment motions, one with eight pages and one with four pages, meaning ST is limited to 12 pages total for its responses, if ST’s understanding of the OGP is correct. One of the motions is a “failure of proof” motion that requires more pages to respond to than it takes to submit. ST thus respectfully requests three additional pages for its summary judgment responses, i.e., a total of 15 pages for the two responses.

ST conferred with Trustees and Trustees do not oppose, provide they get three extra pages for their responses to ST's *Daubert*/strike motions. That is acceptable to ST.

ST and Trustees thus respectfully request that ST be allowed three additional cumulative pages to respond to Trustees' summary judgment motions and Trustees be allowed three additional cumulative pages to respond to ST's *Daubert*/strike motions. The parties respectfully submit that good cause exists that warrants the granted of these requests, as set forth above.

Dated: August 20, 2023

Respectfully submitted,

By: /s/ Michael D. Hatcher

Michael J. Bettinger
California Bar No. 122196
mbettinger@sidley.com
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, California 94104
(415) 772-1200
(415) 772-7400 – Fax

Michael D. Hatcher
Texas Bar No. 24027067
mhatcher@sidley.com
SIDLEY AUSTIN LLP
2021 McKinney Avenue, Suite 2000
Dallas, Texas 75201
(214) 981-3300
(214) 981-3400 – Fax

Richard A. Cederoth
Texas Bar No. 6185199
rcederoth@sidley.com
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
(312) 853-7026
(312) 853-7036 – Fax

Max Ciccarelli
Texas Bar No. 00787242
max@ciccarellilawfirm.com
CICCARELLI LAW FIRM
100 North 6th Street, Suite 502
Waco, Texas 76701
(214) 444-8869

Thomas N. Tarnay
Texas Bar No. 24003032
ttarnay@tarnaylaw.com
THOMAS TARNAY PLLC
2103 Virginia Place
Plano, Texas 75094
(214) 395-8212

**ATTORNEYS FOR DEFENDANTS
STMICROELECTRONICS
INTERNATIONAL N.V. and
STMICROELECTRONICS, INC.**

By: /s/ John P. Lahad

Michael W. Shore (SBN 18294915)
Chijioke E. Offor (SBN 24065840)
Halima Shukri Ndai (SBN 24105486)
THE SHORE FIRM LLP
901 Main Street, Suite 3300
Dallas, Texas 75202
Telephone: (214) 593-9110
Fax: (214) 593-9111
mshore@shorefirm.com
coffor@shorefirm.com
hndai@shorefirm.com

Brian D. Melton (SBN 24068095)
John P. Lahad (SBN 24068095)
Abbey McNaughton (SBN 24116751)
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Tel: (713) 651-9366
Fax: (713) 654-6666
bmelton@susmangodfrey.com
jlahad@susmangodfrey.com
amcnaughton@susmangodfrey.com

**COUNSEL FOR PLAINTIFF
THE TRUSTEES OF PURDUE
UNIVERSITY**

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a true and correct copy of the foregoing document was served on all parties to this action by the Court's ECF system on August 20, 2023.

/s/ Michael D. Hatcher

Michael D. Hatcher